

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No.
)	
ONE (1) WHITE 2021 TOYOTA CAMRY)	
SEDAN, VIN: 4T1G31AK4MU548928,)	
)	
Defendant.)	

VERIFIED COMPLAINT OF FORFEITURE

Plaintiff, the United States of America for its Verified Complaint for Forfeiture states as follows:

NATURE OF THE ACTION

1. This is a civil action *in rem* brought by the United States of America seeking forfeiture of all right, title, and interest in the above-captioned defendant property pursuant Title 21, United States Code, Section 881(a)(4).

2. The defendant property was seized by law enforcement on or about March 2, 2022, and is described more fully as one white 2021 Toyota Camry sedan, VIN: 4T1G31AK4MU548928, (the “defendant property”).

JURISDICTION AND VENUE

3. The Court has jurisdiction over this action pursuant to Title 28, United States Code, Sections 1345, 1355, and 1395.

4. Venue is proper pursuant to Title 28, United States Code, Section 1355(b)(1)(A) because the acts and omissions giving rise to forfeiture took place in the Eastern District of

Missouri. Venue is also proper pursuant to Title 28, United States Code, Section 1395(b) because the defendant property was seized in the Eastern District of Missouri.

STATUTORY FRAMEWORK

5. Title 21, United States Code, Section 881(a)(4) authorizes the civil forfeiture of “all conveyances, including aircraft, vehicles, or vessels, which are used, or are intended for use, to transport, or in any manner to facilitate the transportation, sale, receipt, possession, or concealment of property described in paragraph (1), (2), or (9).”

FACTS GIVING RISE TO THE FORFEITURE

6. Teresa Rendleman (“Rendleman”) is a resident of St. Louis, Missouri.

7. Upon information and belief, at times relevant to this pleading, Rendleman was in a romantic relationship with Edward Shigemura (“Shigemura”).

8. In October 2021, Drug Enforcement Administration (“DEA”) agents received information from a confidential source (“CS”) that Rendleman was a source of supply and distributor of crystal methamphetamine in the St. Louis metropolitan area.

9. From October 2021 to January 2022, DEA utilized the CS to conduct three purchases of methamphetamine. For each sale, the CS met with Rendleman at a predetermined location and purchased ounce quantities of methamphetamine from Rendleman. During each buy, Rendleman transported the methamphetamine to the location in the 2021 Toyota Camry, VIN: 4T1G31AK4MU548928 (the defendant property).

10. On or about February 16, 2022, Rendleman conducted a sale of methamphetamine with the CS at her residence in St. Louis, Missouri.

11. On or about March 2, 2022, investigators conducted surveillance on Rendleman. They observed her exit her residence and enter the defendant property. She then drove to a gas

station where she was apprehended by officers.

12. After she was apprehended, DEA investigators executed a federal search warrant on Rendleman's residence. Shigemura was in the residence when investigators arrived.

13. During the search of the residence, investigators located 1,763 grams of methamphetamine and five firearms. Investigators also seized the defendant property as it was used to facilitate the drug sales.

COUNT ONE – FORFEITURE
21 U.S.C. § 881(a)(4)

14. The United States incorporates by reference the allegations set forth in Paragraphs 1 to 13 above as if fully set forth herein.

15. The defendant property is a vehicle that was used, or intended for use, for the transportation of methamphetamine for drug trafficking.

16. Based on the foregoing, the defendant property is subject to forfeiture pursuant to Title 21, United States Code, Section 881(a)(4) as a vehicle that was used, or intended for use, to transport, or in any manner to facilitate the transportation, sale, receipt, possession, or concealment of a controlled substance, in violation of the Controlled Substances Act.

PRAYER FOR RELIEF

WHEREFORE, the United States of America prays that a Warrant for Arrest be issued in rem for the defendant property and the defendant property be condemned and forfeited to the United States of America, in accordance with the provisions of law; and that the United States of America be awarded its costs in this action, and have such other relief as provided by law and the

nature of the case may require.

Respectfully submitted,

SAYLER A. FLEMING
United States Attorney

/s/ Stephen Casey
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VERIFICATION

I, Brian Chesser, hereby verify and declare under penalty of perjury that I am a Special Agent with the Drug Enforcement Administration, that I have read the foregoing Verified Complaint and know the contents thereof, and that the matters contained in the Verified Complaint are true to my own knowledge and belief.

The sources of my knowledge and information and the grounds of my belief are the official files and records of the United States, information supplied to me by other law enforcement officers, as well as my investigation of this case, together with others, as a Special Agent with the Drug Enforcement Administration.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on: January 10, 2023

(date)

Brian A Chesser

BRIAN CHESSER
Special Agent
Drug Enforcement Administration